



U.S. Department of Energy

~~Office of Environmental Protection~~

0058918

P.O. Box 450
Richland, Washington 99352

02-ED-046

FEB 7 2003

Mr. Michael A. Wilson, Program Manager
Nuclear Waste Program
State of Washington
Department of Ecology
1315 W. Fourth Avenue
Kennewick, Washington 99336

RECEIVED
MAR 17 2003
EDMC

Dear Mr. Wilson:

PERMIT EQUIVALENCY NOTICE 24590-PTF-PEN-M-02-001, "PLANT WASH AND DISPOSAL (PWD) SUMP 00071 RECONFIGURATION" FOR THE WASTE TREATMENT AND IMMOBILIZATION PLANT (WTP)

In accordance with permit condition III.10.C.10.a of Chapter 10 of Hanford Facility Resource Conservation and Recovery Act Permit WA7890008967, the permit equivalency notice 24590-PTF-PEN-M-02-001, "Plant Wash and Disposal (PWD) Sump 00071 Reconfiguration," (Attachment 1) is provided for your review. A copy of the permit equivalency notice has been placed in the WTP operating record.

This permit equivalency notice addresses the reconfiguration of the plant wash and disposal system sump 00071 located at the (-)19 ft. level of the Pretreatment Facility. During abnormal operations, sump 00071 collects overflow from the C2 area floor drain collection vessel and the C3 drain tank. The proposed reconfiguration will result in a revised capacity and dimensions to the sump as described in Attachment 2.

If you have any questions, please contact Lori Huffman, Environmental Division, (509) 376-0104 or Brad Erlandson, Bechtel National, Inc., (509) 371-5748.

Sincerely,

James E. Rasmussen, Director
Environmental Division

ED:LAH

Attachments:

1. Permit Equivalency Notice
2. Certifications

cc: See page 2

Mr. Michael A. Wilson
02-ED-046

-2-

FEB 07 2003

cc w/attach:

B. G. Erlandson, BNI
R. F. Naventi, BNI
J. Cox, CTUIR
S. L. Dahl, Ecology
K. Elsethagen, Ecology
J. Grantham, Ecology
S. J. Skurla, Ecology
S. A. Thompson, FHI
J. L. Hanson, INNOV
P. Sobotta, NPT
J. B. Hebdon, RL
A. C. McKarns, RL
R. Jim, YN
Administrative Record
Environmental Portal, LMSI

Attachment 1
02-ED-046

Permit Equivalency Notice
24590-PTF-PEN-M-02-001



Permit Equivalency Notice

Page 1 of 2

PEN Tracking Number:	PEN-2002-00002	PDC Number:	24590-PTF-PEN-M-02-001
PEN Title:	PWD Sump-00071 Reconfiguration		
Date Prepared:	12/3/02	Originator:	G. Normandin
Source Document Driving Equivalency Determination (If Applicable)			
Source Document Number:	DCN 24590-PTF-DCN-M-02-019	Revision:	0
Source Document Title:	PWD Sump-00071 Reconfiguration		

Affected Permit Information			
Permit Number:	WTP Final Dangerous Waste Permit - WA7890008967	Revision:	7

Permit Equivalence Information	
Specific Section(s)/Condition(s) Affected: Sump Data PT Facility (24590-PTF-PER-M-02-006)	
Description of Substitution/Equivalence: (Attach supplement information)	
<p>PWD-SUMP-00071 is a dry sump located at the (-)19 ft. level of the Pretreatment Facility. During abnormal operations sump-00071 collects overflow from the C2 Area Floor Drain Collection Vessel and the C3 Drain Tank, associated with the Plant Wash and Disposal System. This sump is described in the Sump Data PT Facility document (24590-PTF-PER-M-02-006) as having a maximum capacity of 112.2 gallons with dimensions of 24" X 30" X 36". The sump will have epoxy coating, level detection instrumentation, and a pump that will discharge the liquid from the sump to the Floor Drain Collection Vessel.</p> <p>PWD-SUMP-00071 will be changed from a rectangular dry sump to a round dry sump. This change will result in a revised capacity of 55.1 gallons and dimensions of 30" O.D. x 18". Sump-00071 will continue to have level detection instrumentation, a pump to discharge any liquid to the Floor Drain Collection Vessel, and epoxy coating.</p> <p>As referenced in Permit Condition III.10.C.10.a, "Use of such equivalent or superior items within the limits (e.g., ranges, tolerances, and alternatives) already clearly specified in sufficient detail in Attachment 51 will be classified as an equivalent alternative". Section 4.2.2.6.1, Secondary Containment System Requirements of Attachment 51, prescribes detailed information regarding the WTP wet and dry sumps (Type I vs. Type II). Since the resultant change only affects the size and shape of Sump-00071, not its type, this change has been classified as an alternative equivalent. The required cell liner characteristics, leak detection functionality, materials of construction, as well as the functional purpose of this subsystem, will not be impacted by the change.</p>	



Permit Equivalency Notice

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PEN Tracking Number:	PEN-2002-00002	PDC Number:	24590-PTF-PEN-M-02-001
PEN Title:	PWD Sump-00071 Reconfiguration		
Date Prepared:	12/3/02	Originator:	G. Normandin <i>mn</i> 12/3/02

Approvals and Submittals			
WTP Environmental Manager Approval of PEN:		Approved	
Print Name:	P. Peistrup	Signature:	<i>[Signature]</i> 12/13/02
		Date:	12/13/02

Presented to Regulatory Agency:			
Agency:		Submittal Date:	

Regulatory Agency Approved? (Attach approval documentation if applicable.)	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Date:	
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If PEN not approved, will a PCN be generated?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
PCN Number:		


Attachment 2
02-ED-046

Certification Statements

Bechtel National, Inc. Certification

The following certification statement is provided consistent with Contract No. DE-AC27-01RV14136, Section H.26, Environmental Permits, paragraph (g) for the Hanford Tank Waste Treatment and Immobilization Plant Dangerous Waste Permit compliance schedule submitted for the Pretreatment Facility Permit Equivalency Notice 24590-PTF-PEN-M-02-001, for the Plant Wash and Disposal Sump-00071 Reconfiguration.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.




R. F. Naventi
Project Director



Date

U.S. Department of Energy, Office of River Protection Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.




Roy J. Schepens, Manager
U.S. Department of Energy,
Office of River Protection



Date

U.S. Department of Energy, Richland Operations Office Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.



Keith A. Klein, Manager
U.S. Department of Energy,
Richland Operations Office



Date